

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

| | | |
|---------------------------------|---|-------------------|
| ALLISON COLLIER, |) | |
| |) | |
| PLAINTIFF, |) | |
| |) | |
| V. |) | CASE NO: 07-00922 |
| |) | |
| UNIVERSAL FIDELITY, LP, ET AL., |) | |
| |) | |
| DEFENDANTS. |) | |
| |) | |

PRO TANTO MOTION TO DISMISS

COME NOW the plaintiff, Allison Collier, by and through counsel, Anderson Nelms, and the defendant, National Asset Recovery, by and through counsel, Neal D. Moore, III, and jointly request this Court to dismiss the defendant, National Asset Recovery from this case, and in support of this motion show as follows:

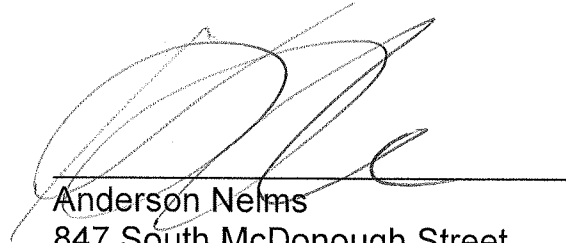
1. This is a pro tanto motion. The plaintiff has specifically reserved the right to pursue all other claims against any party or person not previously released.

2. The plaintiff and National Asset Recovery have resolved all claims asserted between them through a separate confidential release.

WHEREFORE, PREMISES CONSIDERED, the parties to this motion respectfully request this Honorable Court to grant this Pro Tanto Motion to Dismiss and enter an Order dismissing National Asset Recovery

with prejudice, costs taxed as paid while preserving the right of the plaintiff to pursue all other claims.

Respectfully Submitted,



Anderson Nelms
847 South McDonough Street,
Suite 100
Montgomery, Alabama 36104
*Attorney for Plaintiff,
Allison Collier*



Neal D. Moore, III
FERGUSON, FROST &
DODSON, LLP
2500 Acton Road, Suite 200
Birmingham, Alabama 35243
*Attorney for Defendant,
National Asset Recovery*